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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff/Respondent,
13 v.
14 HOANG AI LE,
15 Defendant/Movant.

2:99-CR-00433-WBS-AC

STIPULATION AND ~~{PROPOSED}~~ ORDER FOR
EXTENSION OF TIME IN WHICH TO RESPOND
TO DEFENDANT'S SECTION 2255 PETITION

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17 Respondent United States of America, by and through its attorneys of record, Phillip A. Talbert,
18 United States Attorney, and William S. Wong, Assistant United States Attorney, hereby requests an 8 -
19 day extension of time until February 15, 2017, in which to file its answering brief to defendant Hoang Ai
20 Le's section 2255 petition.

21 Counsel for the Government needs additional time to complete its research and to write its
22 opposition with the following reasons: (1) counsel for the Government began experiencing computer
23 problems beginning Thursday, February 2, 2017, which required IT personnel to eventually replace
24 counsel's computer which operated the legal Dragon word processing software. Counsel's new
25 computer was installed with the newest operating system Windows 10 which required counsel to
26 familiarize himself with this system; (2) counsel continued to experience further computer issues
27 causing further delay in completing the Government's opposition; and (3) counsel had to take time off
28 for medical appointment.

Geoffrey M. Jones, counsel for defendant, does not oppose the Government's request and requests that he be given 30 days to file his reply.

Dated: February 6, 2017

PHILLIP A. TALBERT
United States Attorney

/s/ WILLIAM S. WONG
WILLIAM S. WONG
Assistant United States Attorney

Dated: February 6, 2017

/s/ GEOFFREY M. JONES
GEOFFREY M. JONES
Attorney for Hoang Ai Le

~~PROPOSED~~ ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

It is further ordered that the Government's answering brief to defendant's section 2255 petition is now due February 15, 2017. The defendant's reply, if any, is due 30 days thereafter.

DATED: February 7, 2017

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE